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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

**LISA A. BRYANT,
PLAINTIFF,**

vs.

**MADISON MANAGEMENT SERVICES,
LLC, AND WALDMAN & PORRAS, PLLC,
DEFENDANTS.**

Case No.: 2:20-cv-00594-JAD-EJY

**EMERGENCY MOTION FOR
EXTENSION OF TIME TO EXTEND
DISCOVERY**

COMES NOW, Defendants, Madison Management Services, LLC and Waldman & Porras, PLLC (collectively hereinafter as “Defendant”), by and through their attorney of record, Nicholas M. Porras, Esq, of the law firm of Waldman & Porras, PLLC, and Pursuant to Fed. R. Civ. P. 26(f), and Local Rule 26-1, and hereby files this Motion for Extension of Time, and states as follows:

1. On or about March 27, 2020, Plaintiff filed her Complaint in the instant action.
2. On or about February 1, 2021, this Court issued its Scheduling Order [Doc. No. 39].
3. On or about March 25, 2021, Plaintiff and Defendant entered into a Stipulation for Extension of Time of the Scheduling Order [Doc. No. 43].

4. On or about July 15, 2021, Plaintiff and Defendant entered into a Second Stipulation for Extension of Time of the Scheduling Order [Doc. No. 53].
5. Defendant is hereby respectfully requesting this Court enter an Order Extending the Scheduling Order Deadlines by forty-five (45) days to allow Defendants time so that they may comply with this Court's Scheduling Order.
6. The parties have exchanged initial disclosures and completed most written discovery.
7. Defendants currently need to depose the Plaintiff and the notary witness. Additional documents outstanding may be revealed at these depositions.
8. Good Cause exists such that Defendants need the depositions to proceed with their case. Plaintiff's counsel and the undersigned had a conversation on or about 10/13/21 where he disclosed he had a considerable number of documents to send me. There were also discussions that Defendants need to depose the Plaintiff and the notary witness which necessitate the documents to be produced. Plaintiff sent the documents some time after the conversation from a different no-reply type email address which due to size or origination ended up in the undersigned's spam folder. The undersigned assumed that retrieving documents from Plaintiff's client was taking additional time as to why documents were not received and that the parties would Stip to an extension as Defendants did per the Plaintiff's previous request for an extension. Upon request for a stip for an extension of time, Plaintiff's counsel resent the documents on 12/6/21.
9. The current deadlines are as follows:
 - Discovery Cutoff: **December 8, 2021**
 - Deadline to Amend Pleadings: **September 9, 2021**

- Deadline to Disclose Initial Expert Disclosures: **October 11, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **November 10, 2021**
- Dispositive Motion Deadline: **January 4, 2022**
- Joint Proposed Pretrial Order: **February 3, 2022**

10. Defendant would request the following proposed deadlines be put in place:

- Discovery Cutoff: **January 24, 2022**
- Deadline to Amend Pleadings: **October 24, 2021**
- Deadline to Disclose Initial Expert Disclosures: **November 25, 2021**
- Deadline to Disclose Rebuttal Expert Disclosures: **December 27, 2021**
- Dispositive Motion Deadline: **February 18, 2022**
- Joint Proposed Pretrial Order: **March 20, 2022**

11. No prejudice will occur to this Court or the Parties if granted and good cause supports this request to extend discovery. Defendants will be greatly prejudiced if they are unable to proceed with the depositions.

12. The undersigned has contacted Plaintiff's counsel by phone and email and sent a Proposed Stip but has not received a response, which necessitated the need for the filing of this motion.

WHEREFORE, PREMISES CONSIDERED, Defendant respectfully requests this Court enter an Order Continuing the Scheduling Order Deadlines for a date approximately forty-five (45) days out, together with such further relief and this Honorable Court deems Defendant is entitled.

**DEFENDANTS, MADISON
MANAGEMENT SERVICES, LLC AND
WALDMAN & PORRAS, PLLC'S
EMERGENCY MOTION FOR
EXTENSION OF TIME**

Dated December 7, 2021

/s/ Nicholas M. Porras

Nicholas M. Porras, Esq.
Nevada Bar No.: 12849

ORDER

IT IS SO ORDERED.

Dated this 9th day of December, 2021.


UNITED STATES MAGISTRATE JUDGE